

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

CASA DE MARYLAND, INC., *et al.*

Plaintiffs,

v.

MAYORKAS, *et al.*

Defendants.

Civil No. 20-2118-PX

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT ON THEIR  
HOMELAND SECURITY ACT CLAIM, OR IN THE ALTERNATIVE,  
TO MODIFY PRELIMINARY INJUNCTION**

**ORAL ARGUMENT REQUESTED**

Plaintiffs CASA de Maryland, Asylum Seeker Advocacy Project, Centro Legal de la Raza, Oasis Legal Services, and Pangea Legal Services respectfully move for summary judgment on Count 2 of their Complaint (ECF No. 1) and for vacatur of the two final rules challenged in this action (the Timeline Repeal Rule and the Broader EAD Rule). In the alternative, Plaintiffs respectfully request modification of the Court's preliminary injunction (ECF No. 70) to enjoin enforcement of all provisions of the two final rules on a uniform basis as to all persons.

In support of this motion, Plaintiffs submit a Memorandum of Law; their Statement of Undisputed Material Facts; the Second Declaration of Julia Hiatt-Shepp; the Second Declaration of Jehan Laner; the Second Declaration of Caroline Kornfield Roberts; the Second Declaration of Swapna C. Reddy; the Declaration of Zachary Manfredi, together with the exhibits attached thereto (all filed concurrently with this Motion).

Dated: April 20, 2021

Respectfully submitted,

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